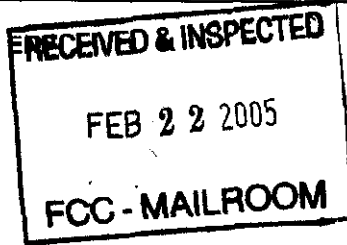


SANGAMON COUNTY
EMERGENCY TELEPHONE SYSTEM DEPARTMENT

DOCKET FILE COPY ORIGINAL

1305 S. 9th St., Springfield, Illinois 62703 Tel (217) 753-6839 Fax (217) 753-6372

Mallorie F. Teubner,
Executive Director



Emergency Telephone System Board

Joe Powell, Chairman
Al Swettman, Vice Chairman
Ralph Caldwell, Member
Michael Midiri, Member
Bill Russell, Member
Eric Smith, Member
Mike Thompson, Member

February 15, 2005

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 94-102

Dear Ms. Dortch,

I am writing this letter on behalf of my Board, and on behalf of my county-wide Public Safety Answering Point (PSAP), the Sangamon County Central Dispatch System (SCCDS), in support of the supplemental filing by the Association of Public-Safety Communications Officials – International, Inc. dated February 4, 2005, reference the "Request for Declaratory Ruling" filed October 6, 2004.

SCCDS is a multi-jurisdictional 9-1-1 and emergency communications center for 52 police, fire, and EMS agencies within the borders of Sangamon County, including the Illinois state capitol, Springfield. We have been receiving wireless 9-1-1 calls since the early 90's. We began handling wireless Phase I calls in 2001, and shortly thereafter, Phase II calls. Our citizens expect that we can locate them in an emergency based upon the Phase II data we receive from the wireless carriers.

Our Emergency Telephone System Board spent considerable staff-hours and money to deploy Phase II capabilities, and are in the process of upgrading our 9-1-1 premise equipment and mapping solutions to provide our dispatchers with tools that will make locating callers easier. This equipment is very expensive, but the Board feels the expenditures are justified given the public's expectation that we are able to locate them, no matter where they are.

Illinois is a very large state with huge variations in population density and terrain. To base the accuracy requirements for wireless 9-1-1 over the entire state will negatively impact the areas with the highest call volume and the greatest dependency on wireless access for emergency services. If we do not require wireless carriers to determine their accuracy in our area, which varies between dense population and very rural areas, we

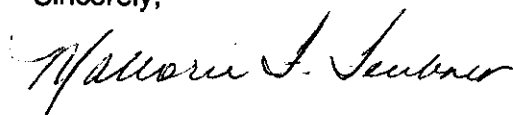
~~and very rural areas, we~~
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will be compromising our ability to find our citizens when they need it most. It also means the expenses we incurred, and continue to incur, to purchase the technology to meet the FCC accuracy guidelines are excessive.

Please help us meet our citizens' expectations and provide the level of service they deserve.

Sincerely,

A handwritten signature in black ink, appearing to read "Mallorie F. Teubner". The signature is fluid and cursive, with the first name being the most prominent.

Mallorie F. Teubner, ENP
Executive Director

Sangamon County Emergency Telephone System Department
Sangamon County Central Dispatch System
1305 S. 9th St.
Springfield, IL 62703
217-753-6839

cc: Edward Thomas
John Muleta
Sangamon County Emergency Telephone System Board